

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

NAVIGATORS INSURANCE COMPANY
as subrogee of MCTYRE TRUCKING
COMPANY, INC.,

Plaintiff,

V.

VERIZON VIRGINIA, INC.,

Case No. 3:11CV061-HEH

**Defendant and
Third-Party Plaintiff,**

V.

**MCTYRE TRUCKING
COMPANY, INC. et al,**

Third-Party Defendants.

**MEMORANDUM OF LAW IN SUPPORT OF
VERIZON VIRGINIA, INC.'S MOTION FOR ENTRY OF JUDGMENT**

COMES NOW Defendant and Third-Party Plaintiff Verizon Virginia, Inc. (“Verizon”), by counsel, and pursuant to Rule 58 of the Federal Rules of Civil Procedure and Local Civil Rule 7(F) of this Court’s Local Rules, submits this memorandum of law in support of its motion for entry of judgment against McKee Oversize Load Escorts, LLC, as follows:

1. This case involves claims by Plaintiff Navigators Insurance Company (“Navigators”) against Verizon and third-party claims by Verizon against four Third-Party Defendants, including McKee. (*See generally* Am. Compl., ECF No. 11; Am. 3d-Party Compl., ECF No. 19.)

2. On or about August 29, 2011, all of the parties in this action reached a global settlement agreement of all claims pending in this matter (“Settlement Agreement”).

3. Under the Settlement Agreement, McKee agreed to the entry of judgment against it on Verizon’s third-party claims against it in the amount of \$12,000.00. McKee does not oppose this motion.

4. Accordingly, Verizon requests that the Court enter judgment against McKee and for Verizon, in accordance with the Settlement Agreement, in the form attached to Verizon’s Motion as Exhibit A.

WHEREFORE, for the reasons stated above, Verizon moves this Court to enter judgment in favor of Verizon and against McKee in the amount of Twelve-Thousand Dollars (\$12,000.00).

Respectfully submitted,

VERIZON VIRGINIA, INC.

By counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2011, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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